

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Plaintiff/Counterclaim-Defendant,

PUERTO RICO FISCAL AGENCY AND FINANCIAL
ADVISORY AUTHORITY, THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF ALL TITLE III
DEBTORS, CORTLAND CAPITAL MARKET SERVICES,
SOLA LTD., SOLUS OPPORTUNITIES FUND 5 LP,
ULTRA MASTER LTD, ULTRA NB LLC, UNION DE
TRABAJADORES DE LA INDUSTRIA ELECTRICA Y
RIEGO INC., AND SISTEMA DE RETIRO DE LOS
EMPLEADOS DE LA AUTORIDAD DE ENERGIA
ELECTRICA,

Intervenor-Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE,

Defendant/Counterclaim-Plaintiff,

THE AD HOC GROUP OF PREPA BONDHOLDERS,
ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., NATIONAL PUBLIC FINANCE
GUARANTEE CORPORATION, AND SYNCORA
GUARANTEE, INC.,

Intervenor-Defendants/Counterclaim-
Plaintiffs.

PROMESA Title III

Adv. Proc. No. 19-391-LTS

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.
REGARDING ITS REQUEST TO BE HEARD AT THE
JUNE 6-8, 2023 URGENT CLAIM ESTIMATION HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order Regarding Procedures for the June 6-8, 2023 Claim Estimation Hearing* (the

“Order”) (ECF No. 24361 in Case No. 17-3283-LTS; ECF No. 3559 in Case No. 17-4780-LTS; ECF No. 238 in Adv. Proc. No. 19-391-LTS)² and respectfully states as follows:

2. Daniel Salinas, Eric Kay and Kate Scherling of Quinn Emanuel Urquhart & Sullivan, LLP, and Rafael Escalera of Reichard & Escalera LLC, co-counsel for Syncora, will each appear in person in the New York Courtroom.

3. Counsel intends to be heard on any matter raised by or presented to the Court at the Hearing, and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora. Counsel also reserves the right cross-examine any expert witness who has submitted a declaration in this matter.

4. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

5. The required Party Exhibit Cover Sheet accompanies this Informative Motion as Exhibit B.

6. The required Party Witness Cover Sheet accompanies this Informative Motion as Exhibit C.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Order.

DATED: June 2, 2023

Respectfully submitted,

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By : /s/ Rafael Escalera
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Co-Counsel for Syncora Guarantee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409

EXHIBIT A

PARTY APPEARANCE SHEET

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person/New York Courtroom
	Name	Daniel Salinas
	Email	danielsalinas@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	202-905-4668
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 2	Appearance Method	In Person/New York Courtroom
	Name	Eric Kay
	Email	erickay@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7273
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 3	Appearance Method	In Person/New York Courtroom
	Name	Kate Scherling
	Email	katescherling@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7178
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 4	Appearance Method	In Person/New York Courtroom
	Name	Rafael Escalera
	Email	escalera@reichardescalera.com
	Law Firm	Reichard & Escalera LLC
	Phone Number	787-777-8877
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A

EXHIBIT B

PARTY EXHIBIT COVER SHEET³

³ Syncora joins in and incorporates by reference the list of exhibits filed by Kramer Levin Naftalis & Frankel LLP, counsel to the Ad Hoc Group of Bondholders, as Exhibit B to its informative motion.

EXHIBIT C

PARTY WITNESS COVER SHEET⁴

⁴ Syncora joins in and incorporates by reference the list of witnesses filed by Kramer Levin Naftalis & Frankel LLP, counsel to the Ad Hoc Group of Bondholders, as Exhibit C to its informative motion.